

E-Rate & School Funding Services  
455 Valley Drive  
East Alton, IL 62024  
314.565.2988(o)  
618.259.7195(f)  
esf1@att.net

August 3, 2013

Mrs. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Appellant: Steve Futrell, Consultant for the Applicant (CRN: 16070846)  
Applicant: East Alton-Wood River School District  
BEN: 136407  
Form 471 #: 633358  
FRN #: 1751380, 1751480, 1751662, 1752361, 1752511, 1752625

Re: **Request for Review**

Administrator Denial for Invoice Deadline Extension Requests dated 06/05 and Earlier  
CC Docket No. 02-6

Dear Mrs. Dortch:

We are requesting the Federal Communications Commission (FCC) review of a decision of the Universal Service Administrative Company (USAC) denying invoice deadline extension requests and subsequent appeals for FRNs 1751380, 1751480, 1751662, 1752361 and 1752511 in letters dated June 05, 2013 and earlier, having the following explanation:

**Current deadline guidelines and procedures do not allow approval for the reason submitted. Invoice Deadline extension requests should be filed by the end of the relevant invoice receipt period for the service category of the FRN requiring an extension (120 days after the end of the service deliver date). You did not demonstrate in your appeal that you filed an extension request in a timely manner. Therefore, your appeal is denied.**

In our original request and subsequent appeal we explained to USAC that the East Alton-Wood River School District lacked knowledge necessary to understand and/or follow complicated E-Rate rules, regulations, policies, procedures, guidelines and deadlines which resulted in its failure to file timely Service Provider Election Letter(s) and/or BEAR form(s).

The District's size often requires staff to have several "job assignments." The E-Rate program manager serves as technology coordinator, full time teacher and athletic sponsor. E-Rate management most often necessitates managing three (3) E-Rate funding years concurrently creating confusion in an already extremely difficult task. Subsequently, this small district has captured only one half of one percent (.0057) of all funds committed it over the past ten (10) funding years.

East Alton-Wood River District serves 546 students, 63% of whom receive free or reduced lunches. As with most Illinois school districts, East Alton-Wood River School District has incurred budget and service cuts in the face of declining education dollars.



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This waiver is justified in the best interest of the District and the public.

Granting of this deadline extension request waiver does not promote waste, fraud or abuse.

There is precedence in waiving procedural guidelines and deadlines for reasons beyond the District's control.

We respectfully submit this appeal and request approval of the invoice deadline extension request(s) to allow the District to realize the intended benefits of the E-Rate Program and recover funds committed it that it has already paid for eligible services, emphasizing again that the District has not committed any waste, fraud or abuse.

Respectfully,

Steve Futrell, M.Ed.

On behalf of the East Alton – Wood River School District